

**Say “No” to stray cats being killed like feral cats
under the draft Threat Abatement Plan (TAP) for Feral Cats**



Suggested wording for you to customise a simple response due 4pm 11 Dec 2023. If you reside in Australia, complete the following submission linked below. Please do not be afraid to voice your opinion in a respectful way. Reside in another country? please contact Tanya Plibersek, the Minister <https://www.tanyaplibersek.com/contact/>

STEP 1: Go to: <https://consult.dcceew.gov.au/draft-updated-threat-abatement-plan-for-predation-by-feral-cats>

Scroll down to the HAVE YOUR SAY, and click on the **TAKE THE SURVEY** button

STEP 2: Complete the **personal information**

STEP 3: You **MUST** complete the **first 5 mandatory questions** of the survey:

1. Have you referred to and / or used the current (2015) threat abatement plan for predation by feral cats?

select YES

How have you referred to / used the 2015 plan? E.G. To understand the changes in the cat terms and definitions

2. Do you support the objectives and actions listed in the drafted updated threat abatement plan select NO

3. Do you have any specific comments on or additional ideas for the objectives and actions outlined in the draft updated threat abatement plan for feral cats? select YES

Please provide specific comments or other ideas here

E.G. I object to the proposed changes, the legal implications and their lack of transparency for abandoned domestic stray cats. The proposal of feral-pest lethal animal management is not appropriate for the class of stray/ domestic semi owned and unowned cats. Consultation with domestic cat management experts needs to be in a separate plan.

4. Do you see a role for yourself / your organisation in contributing to the objectives and actions of the draft updated threat abatement plan for feral cats? select YES

In what ways do you see a role for yourself / your organisation?

E.G. Community engagement, education, community cat rescue and rehoming, adoption of stray cats, etcetera...

5. Do you have any ideas or suggestions for ways to mobilise stakeholder engagement and action in implementing the draft updated threat abatement plan for feral cats? select YES

Please share your ideas with us about ways to mobilise stakeholder engagement and action in implementing the draft updated threat abatement plan for feral cats

E.G. Support reducing the number of domestic cats with free targeted high intensity desexing, APWF Community Cat Programs, Oscar's Law, support community rescuers and vets with grants for desexing owned and semi owned cats

STEP 4: complete survey **question 6** on selected parts of the draft TAP

Complete Section 3 – Cat definitions, ecology, distribution and abundance

- Stray cats must not be classed as feral cats. All stray cats are domestic, the majority are semi owned by caring communities of people in urban areas.
- The stray cat term as used in the 2015 TAP, needs to be a separate category. It should be updated to domestic semi-owned and unowned cats, aligning with the RSPCA, APWF, AIAM and AVA expert policy and advice.
- Reclassifying strays as feral cats and applying the same lethal approaches is inappropriate. Feral cats are not rescued, nor rehomed. The practice to rescue, rehome and medically treat stray/ semi owned and unowned cats must continue and be supported. This results in saving many tens of thousands of cats/kittens per year and for these to be owned again.
- A separate plan and strategies for managing domestic cats is required. Pounds, animal welfare organisations, and community rescue groups and carers should continue offering rehoming outcomes for stray/ domestic semi owned and unowned cats. Refer to APWF for the best cat management strategies and scientific research.

Note to readers: Objective 9 includes “Reducing the impacts of cats living with and around humans requires a different suite of actions, compared with managing feral cats in natural environments.” However, Action 9.1 3rd bullet point applies to stray cats (domestic semi owned and unowned) as a subclass of feral cats: “Implementing feral cat control (e.g. via trapping, shooting where feasible) with local government staff; and where feasible, by lending traps to community members. Continue to discourage TNR.”

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Complete section 5 - Cat Management

- The draft TAP confusingly and wrongly presents lethal cat management options for all cats (including pet/owned cats), being “poison-baiting (deployed from the ground or air)” and “Trapping, hunting and shooting”. Roaming or abandoned domestic stray cats (semi owned or unowned) do not immediately become feral cats.
- The draft TAP lacks engagement with experts, their knowledge and scientific evidence-based research in urban cat management, as highlighted by the minimal selected groups involved in the pre-consultation work.
- It is strongly recommended that different approaches and strategies are required for each cat category as supported by experts in the animal welfare field and raised in 2020 by APWF, AIAM, AWL QLD, The Cat Welfare Society Inc. T/A Cat Haven, and the AVA Management of cats in Australia – Policies.
- The lack of respectful engagement with expert cat management stakeholders does not meet the Guiding Principle #1, nor final recommendations from the 2020 Inquiry into the problem of feral and domestic cats, E.G.:
 - 6a National Feral Cat Taskforce “to include experts on... the ethical treatment of animals”
 - 6b ii “develop principles for best practice cat management plans”
 - 6c enable “best practice principles, in relation to domestic and stray cats”
 - 6f assist ALL councils to “implement domestic cat management plans”
 - 6g enable council AMOs with principles “to manage local cat issues, including easily accessible resources”
- **In our opinion, the approach in the draft TAP to treat stray domestic cats like feral cats, is a poor, illogical, inappropriate, and an inhumane approach for domestic cat issues, and an unsuitable alternative for not meeting key 2020 objectives for supporting domestic cat management. This needs to be rectified.**
- It is strongly recommended that domestic cat management policies, processes and procedures be the responsibility of an independent office for animal welfare, with a separate national group, heavily involving expert stakeholders in domestic cat knowledge and evidence based scientific research for the most effective cat management techniques. It is strongly recommended the scope include APWF advice on scientific evidence-based research from Australia and overseas on what works and what doesn’t, including:
 - Mandatory desexing, cat containment & curfews are not successful
 - Community cat programs are successful
 - High intensity targeted free desexing in low socio economic areas are successful
 - Trap-adopt-or-return home programs are successful
 - Trap and kill programs are not successful nor cost justified
 - Impacts to wildlife need to be based on all Australian research (and not, in our opinion, from selected exaggerated estimates that are extrapolated from questionable assumptions)Refer APWF response to draft TAP.
- **The intentions to increase enabling community members to trap roaming cats, without training, nor oversight, nor enforcement of controls, for trapping and humanely destroying feral cats (which is intended for stray cats), are strongly opposed as being governmental negligence, and it is believed incite and increase animal cruelty to all cats.** Refer action 9.1 where feral and subclass stray cat actions include: trapping and shooting by councils, “lending traps to community members”, and “discouraging TNR”.
- **Given the lack of transparency of the significant change to lethally treat domestic stray cats, the lack of domestic cat expert evidence available to all stakeholders, and the lack of the legal implications and ramifications for stray cats, then the consultation process has major flaws, and should be rerun once the draft plan is updated. The limited selected pre-consultation with the Have Your Say approach is not effective nor efficient, nor fair and reasonable for review by stakeholders caring for, rehoming or adopting a stray cat.**

Potential impacts to stray cats & rehoming organisations and individuals

It is believed that each year, many tens of thousands of cats who are semi owned or unowned cats across our states and territories will no longer be rehomed and find new families and homes, instead these cats will be poisoned, shot or trapped to be killed / euthanased.

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By just shifting the stray cat category to be a subset of feral cats rather than as a separate category as in the 2015 TAP, this implies that if and once the new draft TAP is approved, then as in each state and territory as there are “loose” or non existent definitions for categories of cats, that:

- the existing feral cat legislation and supporting protocols, processes/ procedures will then apply to stray cats, both semi owned domestic cats (eg in communities or colonies managed by carers), or unowned domestic cats (eg roaming abandoned cats)
- both feral cats and stray cats (semi owned and unowned cats), **must be destroyed and not rescued and rehomed** (as a “pest” animal, like a fox)
- **the activities to care for, take in and rehome stray / semi owned and unowned domestic cats may be seen as illegal** (eg in the past the Qld authorities have already charged feral cat feeders)
- across our nation, all council pounds, the large animal welfare organisations (eg RSPCA, AWL, CPS, etc), hundreds of vets, and hundreds if not thousands of largely volunteer based cat rehoming and community based rescue groups and individuals (carers), will need to **cease caring for, and taking in strays as semi owned or unowned domestic cats for rehoming** etc.

Community based cat carers and rescuers

Killing semi owned and unowned cats, deeming rescue and rehoming as illegal activities, and closing down rescue and rehoming outcomes for abandoned domestic cats will also have a significant devastating impact on rescue/ carer groups and individuals. Carers and rescuers have an extremely strong bond with the cats under their care.

In NSW alone, each year tens of thousands of cats are rehomed by the council pounds, the large animal welfare organisations, designated rehoming organisations, which in 2019/2020 provided new families for over 30,000 cats and dogs in NSW. In addition to these organisations who provide reports to the NSW government, there are veterinarians, and small community-based rescue organisations and individuals (sometimes considered carers), who also take in, desex etc and rehome cats. In NSW alone, there are hundreds of these groups and individuals across the state, who are believed to collectively rehome thousands of cats each year. and may no longer do so as the stray cats are to be killed.

For example, the impact of the shooting “cull” incident on the Newcastle Stockton breakwall cats (domestic semi owned cats) and their rescuers/ rehomers/ carers has been researched, including:

“caregivers described the scene they were met with on the morning after the event using words such as ‘horrific’ and ‘bloodbath’. In response to this event, caregivers described their immediate emotional responses using words such as ‘traumatic’, ‘mortified’, ‘disbelief’, and ‘shock’. Their immediate responses to the cull also included feelings of betrayal”

“the severity of the adverse psychological impacts, and the morbidity rate amongst the cat caregivers we interviewed, was far greater than would be expected as a risk to the community if the cats had remained at the site. We therefore suggest that potential legal ramifications should be considered before authorities intentionally choose a method of management that is likely to inflict substantial harm on community members.” [https://www.mdpi.com/2076-2615/13/2/271]

Complete section 8 - Rate your overall impression of the draft Updated Threat Abatement Plan for Predation by Feral Cats Select **Very Poor** for all 3 areas as the draft TAP and its consultation process are flawed

Want to know more? refer to APWF : <https://petwelfare.org.au/response-to-draft-tap/>

Refer to LRC: <https://loverescuecollaborate.org/2023/11/23/australian-draft-threat-abatement-plan-for-predation-by-feral-cats-due-4pm-11-dec-2023/>

Questions? Contact: <https://www.facebook.com/loverescuecollaborate>